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9 *Attorneys for Carrington Mortgage Services, LLC*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 DITECH FINANCIAL LLC;

13 Plaintiff,

14 vs.

15 NORTHGATE HOMEOWNERS
ASSOCIATION; NEVADA ASSOCIATION
16 SERVICES; MARIA LOYO-MORALES;
KIMBERLY TIBONI; DOES 1-10,
17

18 Defendants.

Case No.: 2:16-cv-02400-MMD-VCF

**STIPULATION AND ORDER TO
CONTINUE DEADLINES FOR BRIEFING
FOR MOTIONS FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION
[FIRST REQUEST]**

19 Carrington Mortgage Services, LLC has assumed servicing of the loan at issue in this case.
20 Ditech Financial LLC no longer has an interest in the loan. Until today, Carrington was unaware of
21 the motions [ECF Nos. 66, 67, 68, 69] filed by Maria Loyo-Morales on May 14, 2021. Carrington
22 retained Akerman LLP today, in the afternoon, after learning about Loyo-Morales's pending motions
23 from its foreclosure trustee. Neither Carrington nor Akerman knew about the motions nor the court's
24 minute order [ECF No. 70] until this afternoon. Carrington needs additional time to enter an
25 appearance, review the prior history of the case, investigate the contentions made in the pending
26 motions, and prepare a response. This is the first stipulation for extension of time to related to the
27 motions filed by Ms. Loyo-Morales.
28

Carrington and Loyo-Morales stipulate to modify its scheduling order as follows:


- Carrington will postpone the currently-scheduled foreclosure to June 15, 2021;
- Carrington's opposition to the motions for TRO and preliminary injunction [ECF Nos. 66, 67, 69] will be due on June 1, 2021.
- Loyo-Morales's reply in support of her motions for TRO and preliminary injunction will be due on June 11, 2021.
- The parties request no change to the court's determination to consider the motion to set aside the default judgment [ECF No. 68] in the ordinary course.

The parties anticipate this proposed schedule will allow the court to consider the motion for TRO and preliminary injunction in sufficient time before the rescheduled foreclosure sale (i.e., June 15, 2021). Should the court require additional time, the parties request it modify the proposed schedule accordingly. Good cause exists to grant the relief requested and no party will be prejudiced by the extension

DATED this 19th day of May 2021.

AKERMAN LLP <u>/s/ Scott R. Lachman</u> ARIEL E. STERN, ESQ. Nevada Bar No. 8276 NATALIE L. WINSLOW, ESQ. Nevada Bar No. 12125 SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016 1635 Village Center Circle, Suite 200 Las Vegas, Nevada 89134 <i>Attorneys for Carrington Mortgage Services, LLC</i>	CORY READE DOWS AND SHAFER <u>/s/ R. Christopher Reade</u> R. CHRISTOPHER READE, ESQ. Nevada Bar No. 6791 1333 North Buffalo Drive, Suite 210 Las Vegas, Nevada 89128 <i>Attorney for Maria Loyo-Morales</i>
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IT IS SO ORDERED


UNITED STATES DISTRICT JUDGE

DATED: May 20, 2021